UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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EPB-0778
NJK-6122

Attorneys for the Plaintiff:
Tristar Products, Inc.

TRISTAR PRODUCTS, INC. **(a Pennsylvania corporation),** Plaintiff,	
v.	**CIVIL ACTION FILE NUMBER:**
PENN LLC d/b/a PULSETV.COM (an Illinois limited liability company), and PULSE DIRECT, INC. d/b/a PULSETV.COM (an Illinois corporation),	*Document filed Electronically*
Defendants.	**JURY TRIAL DEMANDED**

COMPLAINT FOR INTELLECTUAL PROPERTY INFRINGEMENT AND DEMAND FOR JURY TRIAL

Plaintiff, Tristar Products, Inc., a Pennsylvania corporation (hereinafter “Tristar Products” or “Plaintiff”), by its undersigned attorneys, for its Complaint against Penn LLC d/b/a PulseTV.Com, an Illinois limited liability company (“Penn”) and Pulse Direct, Inc. d/b/a PulseTV.Com, an Illinois corporation (“Pulse Direct”) (collectively, “Defendants” or “Pulse TV”), upon actual knowledge with respect to itself and its own acts, and upon information and belief as to all other matters, alleges as follows:

THE PARTIES

1. Plaintiff Tristar Products is a Pennsylvania corporation having its corporate headquarters at 492 Route 46 East, Fairfield, New Jersey 07004.

2. Upon information and belief, Defendant Penn is an Illinois limited liability company having its principal place of business at 7851 185th Street, #106, Tinley Park, Illinois 60477 and whose registered agent is Richard J. Cochran, Esq. having an address of 111 West Washington Street, Suite 1900, Chicago, Illinois 60602.

3. Upon information and belief, Defendant Pulse Direct is an Illinois corporation having its principal place of business at 7851 185th Street, #106, Tinley Park, Illinois 60477 and whose registered agent is Richard J. Cochran, Esq. having an address of 111 West Washington Street, Suite 1900, Chicago, Illinois 60602.

JURISDICTION AND VENUE

4. This is a civil action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code and for trade dress infringement arising under the Lanham Act, Title 15 of the United States Code. The Court has subject matter jurisdiction over the action pursuant to 28 U.S.C § 1331 and 28 U.S.C. §1338(a), as it involves substantial claims arising under the Patent Laws of the United States and the Lanham Act together with related claims for patent infringement, trade dress infringement, false advertising and unfair competition. The Court has supplemental jurisdiction over the related state law claims pursuant to 28 U.S.C. § 1338(b) and 28 U.S.C. § 1367.

5. Upon information and belief, personal jurisdiction is proper in this Court as Defendants solicit business and conduct business within the State of New Jersey through its website www.pulsetv.com (the "Pulse TV website"). Therefore, the Court has personal jurisdiction over Defendants pursuant to N.J. Ct. R. 4:4-4 and venue is proper in this judicial district pursuant to 28 U.S.C. §1391(b), 28 U.S.C. §1391(c), and 28 U.S.C. §1400(b).

BACKGROUND

6. On February 14, 2017, U.S. Patent No. D778,664 (the "'664 patent") entitled "Pan" duly and legally issued to Keith Mirchandani and Mo-Tsan Tsai. The '664 patent was assigned to Tristar Products and KE M.O. House Co., Ltd. on May 23, 2016 by Mo-Tsan Tsai and June 20, 2016 by Keith Mirchandani. The assignment was duly recorded with the United States Trademark and Patent Office on December 21, 2016. Tristar Products maintains the exclusive right to make, have made, use, distribute, sell, offer for sale, and import in the United States certain products covered by the '664 patent. A true and correct copy of the '664 patent is attached hereto as Exhibit A.

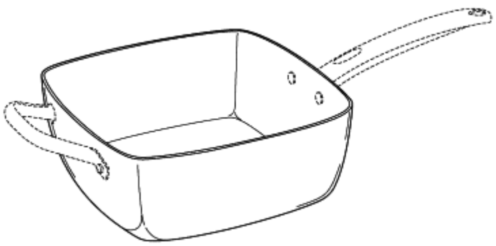
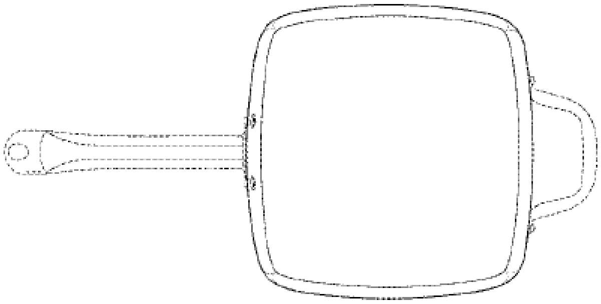
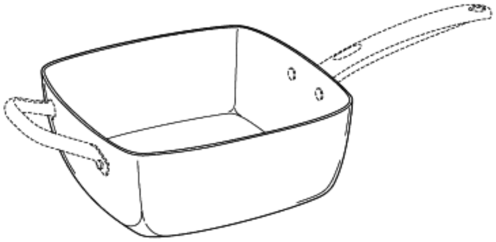
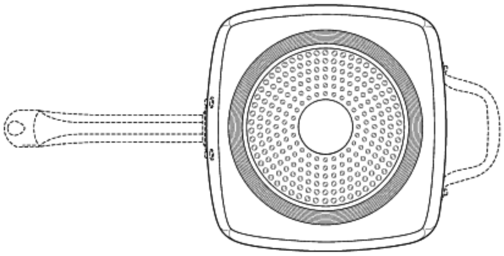
7. On February 7, 2017, U.S. Patent No. D778,103 (the "'103 patent") entitled "Pan" duly and legally issued to Keith Mirchandani and Mo-Tsan Tsai. The '103 patent was assigned to Tristar Products and KE M.O. House Co., Ltd. on May 23, 2016 by Mo-Tsan Tsai and June 20, 2016 by Keith Mirchandani. The assignment was duly recorded with the United States Trademark and Patent Office on December 19, 2016. Tristar Products maintains the exclusive right to make, have made, use, distribute, sell, offer for sale, and import in the United States certain products covered by the '103 patent. A true and correct copy of the '103 patent is attached hereto as Exhibit B.

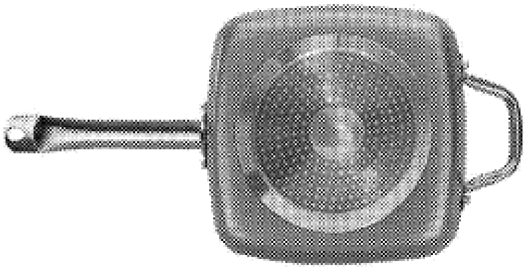
8. On November 29, 2016, U.S. Patent No. D772,641 (the "'641 patent") entitled "Pan" duly and legally issued to Keith Mirchandani and Mo-Tsan Tsai. The '641 patent was assigned to Tristar Products and KE M.O. House Co., Ltd. on May 23, 2016 by Mo-Tsan Tsai and June 20, 2016 by Keith Mirchandani. The assignment was duly recorded with the United States Trademark and Patent Office on October 12, 2016. Tristar Products maintains the exclusive right to make, have made, use, distribute, sell, offer for sale, and import in the United States certain products covered by the '641 patent. A true and correct copy of the '641 patent is attached hereto as Exhibit C.

9. The '664 patent, '103 patent, and the '641 patent (collectively, the "Patents-in-Suit") each protect the design of a pan for use in cooking. Tristar utilizes the designs that are protected by the '664 patent, '103 patent, and the '641 patent in its highly successful "COPPER CHEF" square pan. The COPPER CHEF pan has been the subject of extensive promotion and has attained immense success in the marketplace with sales exceeding $200,000,000 (two hundred million dollars).

10. Upon information and belief, Defendants make, use, sell, and/or offer to sell and induce others to make, use, sell, and/or offer to sell pans that embody and/or use the inventions claimed in the '664 patent, '103 patent, and the '641 patent, including at least under the brand name "COPPER SQUARE CASSEROLE PAN."

11. A side-by-side comparison of the products reveals the infringing nature of the COPPER SQUARE CASSEROLE PAN product:

Design of '664 Patent	**Defendants' COPPER SQUARE CASSEROLE PAN Product**
	
	
Design of '103 Patent	**Defendants' COPPER SQUARE CASSEROLE PAN Product**
	
	

Design of the '641 Patent	**Defendants' COPPER SQUARE CASSEROLE PAN Product**
	

12. At least as early as June 2016, Tristar Products introduced the COPPER CHEF pan. The COPPER CHEF is pictured below:

13. The "AS SEEN ON TV" logo identifies products sold and advertised through national direct response television commercial campaigns. Consumers recognize the "AS SEEN ON TV" logo on a product as signifying that the product is and was extensively and nationally advertised on television. The "AS SEEN ON TV" logo is a significant and important marketing tool for the sale of consumer products.

14. Tristar Products prominently markets the COPPER CHEF products with the "AS SEEN ON TV" logo. Tristar Products has spent approximately $40,000,000 (forty million dollars) in television advertising for the COPPER CHEF products.

15. Defendants advertise their COPPER SQUARE CASSEROLE PAN product in an "AS SEEN ON TV" department on the Pulse TV Website, http://www.pulsetv.com/As-Seen-On-TV/products/167/. The Pulse TV Website says "If you have seen it on TV or an Infomercial then it's probably here. Buy these and similar products for less at PulseTV!" A true and correct copy of this webpage is attached hereto as Exhibit D.

16. Upon information and belief, Defendants have not and do not advertise the COPPER SQUARE CASSEROLE PAN on television.

17. Defendants' use of the "AS SEEN ON TV" slogan was adopted to confuse consumers and to improperly benefit from Tristar's extensive television advertising.

18. The trade dress of the COPPER CHEF includes but is not limited to the size, shape and color of the COPPER CHEF pan in addition to the size, shape and location of the handles and rivets.

19. Tristar Products has heavily advertised and promoted the COPPER CHEF trade dress. As a result of these efforts, the public recognizes and understands the design of the COPPER CHEF to distinguish and identify the product. The COPPER CHEF has acquired a respected reputation and has been the recipient of press coverage. Tristar has received accolades and industry recognition for its advertising efforts. Therefore, the COPPER CHEF trade dress has acquired secondary meaning.

20. All the features that make up the COPPER CHEF trade dress are nonfunctional, in that they serve a decorative and aesthetic purpose and are not necessary to exist in this design in order for the COPPER CHEF to be used for its intended purpose. The nonfunctionality of the COPPER CHEF trade dress is further demonstrated by evidence in the marketplace of countless cookware items with completely different designs than the COPPER CHEF trade dress.

21. Defendants' COPPER SQUARE CASSEROLE PAN product copies the look and feel of the COPPER CHEF trade dress and is confusingly similar to the COPPER CHEF trade dress.

22. On information and belief, Defendants knew of the COPPER CHEF trade dress prior to the first promotion and sale of the COPPER SQUARE CASSEROLE PAN product.

23. Defendants purposefully adopted an appearance for their competing COPPER SQUARE CASSEROLE PAN product with the intent to trade upon the goodwill earned by Plaintiff.

24. Upon information and belief, as a result of Defendants' trade dress infringement, consumers are actually confused and likely to be confused into thinking that Defendants' COPPER SQUARE CASSEROLE PAN products are genuine COPPER CHEF square pans.

COUNT I

INFRINGEMENT OF THE '664 PATENT BY DEFENDANTS

25. Tristar Products realleges and incorporates the allegations set forth in Paragraph 1 through Paragraph 24 herein.

26. Upon information and belief, Defendants directly infringe, infringe under the doctrine of equivalents, contributorily infringe, and/or actively induce infringement of the '664 patent by making, using, selling, and/or offering to sell, or inducing others to make, use, sell, or offer to sell pans that embody or use the ornamental design claimed in the '664 patent. Such infringing pans include at least the COPPER SQUARE CASSEROLE PAN product depicted in Paragraph 11, above.

27. An ordinary observer, giving as much attention typical of a purchaser, would find the design of Defendants' COPPER SQUARE CASSEROLE PAN product to be substantially the same as Plaintiff's patented design.

28. Defendants' acts of infringement of the '664 patent have caused and will continue to cause Tristar Products damages for which Tristar Products is entitled to compensation pursuant to 35 U.S.C. § 284.

29. Defendants' acts of infringement of the '664 patent have caused and will continue to cause Tristar Products damages for which Tristar Products lacks an adequate remedy at law.

30. Defendants' acts of infringement of the '664 patent have caused and will continue to cause Tristar Products irreparable harm unless such infringing activities are enjoined by this Court pursuant to 35 U.S.C. § 283.

31. Defendants' adoption and use of a colorable imitation of Plaintiff's patented design has caused and is causing substantial irreparable harm to Plaintiff and will continue to damage Plaintiff unless enjoined by this Court.

32. This case is exceptional and, therefore Tristar Products is entitled to an award of attorneys' fees pursuant to 35 U.S.C. § 285.

33. Upon information and belief, Defendants' commercial activities relating to the making, using, offering for sale, selling, and/or importing into the United States pans that embody the ornamental design protected by the '664 patent have continued and are continuing with knowledge of the '664 patent, in spite of the fact that Defendants' actions constitute infringement of the '664 patent. These commercial activities are, at a minimum, in reckless disregard of Tristar Products' rights under the '664 patent. Such acts of infringement have therefore been intentional, deliberate and willful. Defendants' acts constitute violations of 35 U.S.C. § 271.

COUNT II

INFRINGEMENT OF THE '103 PATENT BY DEFENDANTS

34. Tristar Products realleges and incorporates the allegations set forth in Paragraph 1 through Paragraph 33 herein.

35. Upon information and belief, Defendants directly infringe, infringe under the doctrine of equivalents, contributorily infringe, and/or actively induce infringement of the '103 patent by making, using, selling, and/or offering to sell, or inducing others to make, use, sell, or offer to sell pans that embody or use the ornamental design claimed in the '103 patent. Such infringing pans include at least the COPPER SQUARE CASSEROLE PAN product depicted in Paragraph 11, above.

36. An ordinary observer, giving as much attention typical of a purchaser, would find the design of Defendants' COPPER SQUARE PAN CASSEROLE product to be substantially the same as Plaintiff's patented design.

37. Defendants' acts of infringement of the '103 patent have caused and will continue to cause Tristar Products damages for which Tristar Products is entitled to compensation pursuant to 35 U.S.C. § 284.

38. Defendants' acts of infringement of the '103 patent have caused and will continue to cause Tristar Products damages for which Tristar Products lacks an adequate remedy at law.

39. Defendants' adoption and use of a colorable imitation of Plaintiff's patented design has caused and is causing substantial irreparable harm to Plaintiff and will continue to damage Plaintiff unless enjoined by this Court.

40. Defendants' acts of infringement of the '103 patent have caused and will continue to cause Tristar Products irreparable harm unless such infringing activities are enjoined by this Court pursuant to 35 U.S.C. § 283.

41. This case is exceptional and, therefore Tristar Products is entitled to an award of attorneys' fees pursuant to 35 U.S.C. § 285.

42. Upon information and belief, Defendants' commercial activities relating to the making, using, offering for sale, selling, and/or importing into the United States pans that embody the ornamental design protected by the '103 patent have continued and are continuing with knowledge of the '103 patent, in spite of the fact that Defendants' actions constitute infringement of the '103 patent. These commercial activities are, at a minimum, in reckless disregard of Tristar Products' rights under the '103 patent. Such acts of infringement have therefore been intentional, deliberate and willful. Defendants' acts constitute violations of 35 U.S.C. § 271.

COUNT III

INFRINGEMENT OF THE ‘641 PATENT BY DEFENDANTS

43. Tristar Products realleges and incorporates the allegations set forth in Paragraph 1 through Paragraph 42 herein.

44. Upon information and belief, Defendants directly infringe, infringe under the doctrine of equivalents, contributorily infringe, and/or actively induce infringement of the ‘641 patent by making, using, selling, and/or offering to sell, or inducing others to make, use, sell, or offer to sell pans that embody or use the ornamental design claimed in the ‘641 patent. Such infringing pans include at least the COPPER SQUARE CASSEROLE PAN product depicted in Paragraph 11, above.

45. An ordinary observer, giving as much attention typical of a purchaser, would find the design of Defendants’ COPPER SQUARE CASSEROLE PAN product to be substantially the same as Plaintiff’s patented design.

46. Defendants’ acts of infringement of the ‘641 patent have caused and will continue to cause Tristar Products damages for which Tristar Products is entitled to compensation pursuant to 35 U.S.C. § 284.

47. Defendants’ acts of infringement of the ‘641 patent have caused and will continue to cause Tristar Products damages for which Tristar Products lacks an adequate remedy at law.

48. Defendants’ adoption and use of a colorable imitation of Plaintiff’s patented design has caused and is causing substantial irreparable harm to Plaintiff and will continue to damage Plaintiff unless enjoined by this Court.

49. Defendants’ acts of infringement of the ‘641 patent have caused and will continue to cause Tristar Products irreparable harm unless such infringing activities are enjoined by this Court pursuant to 35 U.S.C. § 283.

50. This case is exceptional and, therefore Tristar Products is entitled to an award of attorneys' fees pursuant to 35 U.S.C. § 285.

51. Upon information and belief, Defendants' commercial activities relating to the making, using, offering for sale, selling, and/or importing into the United States pans that embody the ornamental design protected by the '641 patent have continued and are continuing with knowledge of the '641 patent, in spite of the fact that Defendants' actions constitute infringement of the '641 patent. These commercial activities are, at a minimum, in reckless disregard of Tristar Products' rights under the '641 patent. Such acts of infringement have therefore been intentional, deliberate and willful. Defendants' acts constitute violations of 35 U.S.C. § 271.

COUNT IV

FEDERAL UNFAIR COMPETITION, FALSE DESIGNATION OF ORIGIN, AND TRADE DRESS INFRINGEMENT BY DEFENDANTS

52. Tristar Products realleges and incorporates the allegations set forth in Paragraph 1 through Paragraph 51 herein.

53. This claim arises under 15. U.S.C. § 1125.

54. Upon information and belief, Defendants' unauthorized use in interstate commerce of the COPPER CHEF trade dress has caused and is likely to cause confusion, mistake, or deception as to the (a) characteristics, qualities, or origin of the COPPER SQUARE CASSEROLE PAN product, (b) an affiliation, connection, or association between Plaintiff and Defendants, and/or (c) sponsorship or approval of the COPPER SQUARE CASSEROLE PAN product by Plaintiff.

55. Such actions, as used in commercial advertising, have misrepresented and continue to misrepresent the nature, characteristics, or qualities of Defendants' COPPER SQUARE CASSEROLE PAN product.

56. Upon information and belief, Defendants have intentionally adopted and used the COPPER CHEF trade dress so as to profit from Plaintiff's reputation by confusing the public as to the source, origin, sponsorship, or approval of Defendants' COPPER SQUARE CASSEROLE PAN product, with the intent of deceiving and misleading the public, and to wrongfully trade on the goodwill and reputation of Plaintiff.

57. Defendants' use of the COPPER CHEF trade dress constitutes false or misleading statements.

58. Defendants' false or misleading statements are intended to influence consumers' decisions to purchase the COPPER SQUARE CASSEROLE PAN product.

59. As a result of Defendants' false or misleading statements, Tristar Products' goodwill and reputation associated with the COPPER CHEF products will be damaged.

60. Defendants' acts of trade dress infringement, unfair competition, and false designation of origin have caused and will continue to cause Tristar Products damages for which Tristar Products is entitled to compensation.

61. Defendants' acts of trade dress infringement, unfair competition, and false designation of origin have caused and will continue to cause Tristar Products damages for which Tristar Products lacks an adequate remedy at law.

62. Defendants' conduct has caused and will continue to cause substantial and irreparable harm to Plaintiff unless such actions are enjoined by this Court pursuant to 15 U.S.C. § 1116(a).

COUNT V

FEDERAL FALSE ADVERTISING BY DEFENDANTS

63. Tristar Products realleges and incorporates the allegations set forth in Paragraph 1 through Paragraph 62 herein.

64. This claim arises under 15 U.S.C. §1125(b).

65. Defendants' use of the "AS SEEN ON TV" slogan on the webpages offering the COPPER SQUARE CASSEROLE PAN constitutes false or misleading statements of fact that the COPPER SQUARE CASSEROLE PAN is advertised and promoted on television.

66. Defendants' false and/or misleading statements have actually deceived or have a tendency to deceive consumers who are interested in purchasing genuine "AS SEEN ON TV" products. Such deception will continue as Tristar Products continues to market and sell the COPPER CHEF products.

67. Defendants' deceptive acts are material and likely to influence the consumers' purchasing decisions.

68. Defendants' acts have caused and are likely to cause competitive or commercial injury to Tristar Products.

69. Upon information and belief, Defendants' false and/or misleading statements have been knowing, deliberate, willful, intended to cause confusion, intended to cause mistake, and intended to deceive the purchasing public and with the intent to trade on the goodwill and reputation of Tristar Products and the COPPER CHEF products.

COUNT VI

COMMON LAW TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION BY DEFENDANTS

70. Tristar Products realleges and incorporates the allegations set forth in Paragraph 1 through Paragraph 69 herein.

71. This claim arises under New Jersey common law.

72. Defendants have acted unfairly through their unauthorized use of Plaintiff's trade dress. Defendants' conduct has and will mislead and deceive consumers as to the identity and source of the COPPER SQUARE CASSEROLE PAN product.

73. Defendants' unfair competition has caused and will continue to cause Tristar Products damages for which Tristar Products is entitled to compensation.

74. Defendants' unfair competition has caused and will continue to cause Tristar Products damages for which Tristar Products lacks an adequate remedy at law.

75. Defendants' conduct has caused and will continue to cause substantial and irreparable harm to Plaintiff unless such actions are enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Tristar Products prays that the Court enter judgment against Defendants as follows:

A. That Defendants have infringed and are infringing the '664 patent;

B. That Defendants have infringed and are infringing the '103 patent;

C. That Defendants have infringed and are infringing the '641 patent;

D. That Defendants have infringed and are infringing Plaintiff's trade dress;

E. That Defendants have and are falsely designating the origin of the COPPER SQUARE CASSEROLE PAN product;

F. That Defendants have and are falsely advertising the COPPER SQUARE CASSEROLE PAN product;

G. That Defendants have engaged in unfair competition;

H. That Defendants and their officers, directors, agents, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further acts of infringement of the '664 patent;

I. That Defendants and their officers, directors, agents, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further acts of infringement of the '103 patent;

J. That Defendants and their officers, directors, agents, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further acts of infringement of the ‘641 patent;

K. That Defendants and their officers, directors, agents, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further acts of trade dress infringement;

L. That Defendants and their officers, directors, agents, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further acts of unfair competition;

M. That Defendants and their officers, directors, agents, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further acts of false advertising;

N. That Defendants and their officers, directors, agents, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from further acts of false designation of origin;

O. That Defendants be ordered to pay Tristar Products damages sufficient to compensate for said Defendants’ infringement of the ‘664 patent, with pre-judgment and post-judgment interest, including profits lost as a result of infringement of the ‘664 patent, and enhancing such damages due to the willfulness of the infringement, in accordance with 35 U.S.C. §284;

P. That Defendants be ordered to pay Tristar Products damages sufficient to compensate for said Defendants' infringement of the '103 patent, with pre-judgment and post-judgment interest, including profits lost as a result of infringement of the '103 patent, and enhancing such damages due to the willfulness of the infringement, in accordance with 35 U.S.C. §284;

Q. That Defendants be ordered to pay Tristar Products damages sufficient to compensate for said Defendants' infringement of the '641 patent, with pre-judgment and post-judgment interest, including profits lost as a result of infringement of the '641 patent, and enhancing such damages due to the willfulness of the infringement, in accordance with 35 U.S.C. §284;

R. That Defendants be ordered to pay Tristar Products damages sufficient to compensate for said Defendants' infringement of Plaintiff's trade dress, with pre-judgment and post-judgment interest;

S. That Defendants be ordered to pay Tristar Products damages sufficient to compensate for said Defendants' acts of false designation of origin, with pre-judgment and post-judgment interest;

T. That Defendants be ordered to pay Tristar Products damages sufficient to compensate for said Defendants' acts of false advertising, with pre-judgment and post-judgment interest;

U. That Defendants be ordered to pay Tristar Products damages sufficient to compensate for said Defendants' unfair competition, with pre-judgment and post-judgment interest;

V. That this action be declared as exceptional under 35 U.S.C. § 285 and that Tristar Products be awarded its attorneys' fees, costs, and expenses; and

W. That Tristar Products be awarded such other and further relief as this Court deems proper and just.

DEMAND FOR JURY TRIAL

Tristar Products demands a trial by jury of all issues properly triable to a jury in this case.

Respectfully submitted this 29th day of March, 2017,

Bakos & Kritzer

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Attorneys for the Plaintiff:
Tristar Products, Inc.

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2

Tristar Products, by its undersigned counsel, hereby certifies pursuant to Local Civil Rule 11.2 that the matter in controversy in the present action is the subject of district court cases styled *Tristar Products, Inc. v. Tekno Products, Inc.*, Civil Action No. 1:16-cv-00681 and *Tristar Products, Inc. v. Novel Brands LLC*, Civil Action No. 1:17-cv-00043 in the United States District Court for the District of Rhode Island and *Tristar Products, Inc. v. E. Mishan and Sons Inc.*, Civil Action No. 1:17-cv-001204, *Tristar Products, Inc. v. Telebrands et al.*, Civil Action No. 1:17-cv-001206 and *Tristar Products, Inc. v. Ocean State Jobbers, Inc. et al.*, Civil Action No. 2:17-cv-01767 in the United States District Court for the District of New Jersey.

Respectfully submitted this 29th day of March, 2017,

Bakos & Kritzer

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Attorneys for the Plaintiff:
Tristar Products, Inc.

CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 201.1

Tristar Products, by its undersigned counsel, hereby certifies pursuant to Local Civil Rule 201.1 that, in addition to monetary damages greater than $150,000, Plaintiff seeks injunctive relief, and therefore this action is not appropriate for compulsory arbitration.

Respectfully submitted this 29th day of March, 2017,

Bakos & Kritzer

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